



Chris
NYS110
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May 1, 2007

Stephen R. Kratzke, Esq.
Associate Administrator for Rulemaking
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

NHTSA-2007-17674-00

Dear Mr. Kratzke:

Re: WorldSID; Status and Federalization

The Alliance, a trade association of nine car and light truck manufacturers including BMW Group, DaimlerChrysler, Ford Motor Company, General Motors, Mazda, Mitsubishi Motors, Porsche, Toyota and Volkswagen, appreciates the willingness of the NHTSA to work with the automotive community to finalize the WorldSID side impact anthropomorphic test device. The auto industry in Asia, Europe, and North America, working together with dummy manufacturers, suppliers, Transport Canada, and VRTC, have invested millions of dollars, Euros, and Yen and countless hours of resources to make this sophisticated test tool available. We believe that the WorldSID has the potential to enable manufacturers to design vehicles with improved side impact protection, and we are eager for the federalization to begin as soon as practicable.

Following is an overview of recent developments and our projections for progress toward federalization:

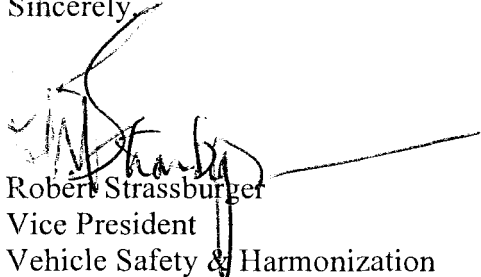
- Last year's durability problems with rib damping material cracking at high energy levels are believed to be solved. The previous version of the material (black colored), while suitable for older frontal impact ribs, was not able to withstand the high deflections and resulting stresses imposed by the flexible WorldSID ribs in side impact durability tests. This material has been changed to a new composition material (blue colored), plus the edge has been modified/tapered for improved adhesion and reduced stress concentration.
- During high energy impacts, interference or "bottoming" in the dummy's pelvis was identified as being caused by a component that could be moved to another area inside the dummy, without affecting the biofidelity. Test results showed that the movement of this data acquisition system component has eliminated this problem.

BMW Group • DaimlerChrysler • Ford Motor Company • General Motors
Mazda • Mitsubishi Motors • Porsche • Toyota • Volkswagen

- Final confirmation of WorldSID's biofidelity should be completed by the beginning of May as tests with the new rib material are currently underway.
- The remainder of the federalization can begin when the NHTSA is satisfied with the results of the biofidelity and durability tests.
- The auto industry is willing to conduct additional tests to assist VRTC with federalization, thereby accelerating the process and reducing the test burden on VRTC.
- If all aspects are completed in a timely manner, we would be most interested in the WorldSID dummy being accepted as an alternate ATD by NHTSA for use in the pending changes to FMVSS 214.

We are thankful for the assistance and patience of VRTC in this process, as well as your support and cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Strassburger", is written over a horizontal line. The signature is stylized and cursive.

Robert Strassburger
Vice President
Vehicle Safety & Harmonization
Alliance of Automobile Manufacturers

cc: R. Medford
J. Kanianthra
M. Monk